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STATEMENT FOR COVINGTON & BURLING IN
RESPONSE TO INQUIRIES FOLLOWING RELEASE
OF A NON-CRITICAL INGREDIENT REPORT

On _____, 1989, the Department of Health and Human Services released a report on ingredients used in the manufacture of cigarettes. The report concluded that the use of ingredients does not raise any significant health concerns.

On behalf of the six major American cigarette manufacturers, Covington & Burling has submitted to the Department of Health and Human Services four annual lists of ingredients used in the manufacture of cigarettes. These submissions were made in accordance with the requirements of the Federal Cigarette Labeling and Advertising Act. Under the Act, companies that manufacture, package or import cigarettes into the United States must submit annually to HHS a list of ingredients added to tobacco in the manufacture of cigarettes.

The Act recognizes that the identity of specific ingredients is an important trade secret that is entitled to protection from disclosure. The Act provides that manufacturers required to provide a list may designate a third party to compile and submit a combined list of ingredients. Covington & Burling, in accordance with this provision, has prepared and submitted each joint list on behalf of the American Tobacco Company and its U.K. affiliate, Gallaher

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Limited, Brown & Williamson Tobacco Corporation, Liggett Group, Inc., Lorillard, Inc., Philip Morris, Inc., and R.J. Reynolds Tobacco Company.

The companies cooperated with HHS in connection with its review of ingredients. Although we believe that the report should put to rest any concerns about the use of ingredients, the manufacturers remain prepared to work with HHS in any future review of the use of ingredients.

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